

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES  
OF AMERICA

V.

WALTER MAY,  
Defendant,

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CRIMINAL NO. 05-30023-MAP

REQUEST FOR DISCOVERY UNDER RULE 404(b)

The government announced that it intends to seek admissibility of the defendant's relationship with three minor boys to prove motive, opportunity, intent, etc... In light of this disclosure that the government intends to seek the admission into evidence of "other crimes, wrongs or acts" of the defendant, pursuant to Federal Rule of Evidence 404(b) the defendant requests that the government disclose to counsel for the defendant, in writing, at least ninety days before trial so the defendant can prepare adequately for trial that the court order the government to disclose, the following: (a) the date, time and place of each alleged crime, wrong or act; (b) a reasonable description of each alleged crime, wrong or act; (c) a list of any documents or other physical evidence upon which the government intends to rely to prove each such alleged crime, wrong or act; and (d) the "special grounds" including the special relevance and probative value for such evidence. The defendant further requests that all discovery related to these acts including police reports, grand jury minutes, witness statements, etc...be provided to the defendant.

Respectfully submitted,

THE DEFENDANT

By: /s/ Alan J. Black  
ALAN JAY BLACK, His Attorney  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to Todd Newhouse, AUSA and Karen Goodwin, AUSA on this on this 16<sup>th</sup> day of January 2007.

/s/ Alan J. Black